

**STORZER & ASSOCIATES, P.C.**  
Sieglinde K. Rath (SR7208)  
Roman P. Storzer, *admitted pro hac vice*  
Robert L. Greene, *admitted pro hac vice*  
1025 Connecticut Ave., N.W. Suite 1000  
Washington, D.C. 20036  
Tel: 202.857.9766  
Fax: 202.315.3996  
*Counsel for Plaintiffs*

**WILENTZ, GOLDMAN & SPITZER, P.A.**  
Donna M. Jennings (DJ7790)  
90 Woodbridge Center Drive  
Post Office Box 10  
Woodbridge, New Jersey 07095  
*Co-Counsel for Plaintiff WR Property LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR PROPERTY  
LLC, a New Jersey limited liability company,

Civ. No. 3:17-DV-03226

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

**DECLARATION OF SHIMON BRUDNY**

SHIMON BRUDNY declares as follows, pursuant to 28 U.S.C. § 1746:

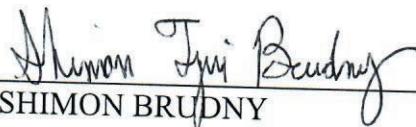
1. I live at 127 Valley Road in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. My religious beliefs prohibit me from pushing a stroller or a wheelchair or carrying food, medication, canes, water bottles, house keys, personal identification, books, prayer shawls and/or reading glasses outside of my home on the Sabbath and on holy days, unless there is an *eruv*, an area enclosed by a wire boundary that symbolically extends the private domain of Jewish households into public areas.
5. There is no *eruv* in my neighborhood and Jackson has passed an ordinance prohibiting the installation of an *eruv*.
6. The lack of an *eruv* hampers my ability to practice my religious beliefs in multiple ways, including:
  - a. It is my religious belief that I should bring my children to shul on the Sabbath and on holy days for at least a portion of the day. However, my two year old son cannot yet walk the distance to the shul. He must go in a stroller or be carried. Because there is no *eruv*, my wife or I cannot push a stroller or carry my son and we are unable to bring him to shul.
  - b. Because there is no *eruv*, only my wife or I can leave the house to attend shul or a *simcha* (celebration) such as a *brit milah* (ritual circumcision) or a *kiddush* to celebrate the birth of a baby girl because we cannot push my son in a stroller or carry him on the sabbath and on holy days. The other of us must stay home and is unable to attend shul or the simcha.

- c. My brother lives a  $\frac{1}{2}$  mile away from me, but because there is no *eruv*, my family cannot go to his house for a shabbos or holy day meal or celebration because we cannot push my son in a stroller or carry him on the sabbath and on holy days.
- d. Similarly, my sister lives about a mile away from me, but because there is no *eruv*, my family cannot go to her house for a sabbath or holy day meal or celebration because we cannot push my son in a stroller or carry him on the sabbath and on holy days.
- e. It is my religious belief that I must study with others on the sabbath. Without an *eruv* I cannot carry my books to shul. By not being able to carry my books, it hampers my ability to pray and study.
- f. Without an *eruv* I can not carry my *tallis* (prayer shawl) to shul.

7. The ordinances prohibiting an *eruv* do not affect my neighbors who are not Orthodox Jews because they are permitted to push strollers and travel to their houses of worship and families with or without an *eruv*. The prohibition on the *eruv* only affects Orthodox Jews.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 8, 2019

  
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SHIMON BRUDNY